1 The Honorable Marsha J. Pechman 2 3 4 5 6 7 UNITED STATES DISTRICT COURT 8 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 9 NORTHWEST ADMINISTRATORS, INC., Case No. 2:21-cv-00982-MJP 10 Plaintiff, THIRD STIPULATED MOTION FOR 11 EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT AND TO v. 12 MODIFY OTHER CASE DEADLINES MOLSON COORS BEVERAGE COMPANY 13 USA LLC, a Delaware limited liability NOTE ON MOTION CALENDAR: **SEPTEMBER 29, 2021** company, 14 Defendant. 15 16 Plaintiff Northwest Administrators, Inc. and Defendant Molson Coors Beverage Company 17 USA LLC, by and through their undersigned counsel of record, hereby stipulate and agree as 18 follows: 19 20 1. The deadline for Defendant to answer or otherwise respond to Plaintiff's Complaint is currently October 1, 2021 (ECF No. 11). 21 2. This is a third request for an extension of deadlines. The reason for each request 22 for extension to answer the Complaint to Compel Audit is that the parties are working to resolve 23 the dispute by the Defendant providing information to the Plaintiff. The parties have made 24 25 substantial progress toward resolution of this dispute, but a few information requests remain 26 outstanding. THIRD STIPULATED MOTION FOR EXTENSION OF TIME TO FOX ROTHSCHILD LLP 1001 FOURTH AVENUE, SUITE 4500 RESPOND TO PLAINTIFF'S COMPLAINT (2:21-CV-00982-MJP) - 1 SEATTLE, WASHINGTON 98154 206-624-3600

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1	3.	3. Based on the foregoing, the parties agree that the time for Defendant to answer or			
2	otherwise respond to the Complaint should be extended to November 1, 2021.				
3	4.	This proposed extension would affect the deadlines set forth in the Court's Order			
4	Regarding Initial Disclosures, Joint Status Report, and Early Settlement ("Initial Scheduling				
5	Order"). (See ECF No. 9) . Accordingly, the parties stipulate to the following proposed				
6	modifications to the Initial Scheduling Order:				
7	(a)	Deadline for FRCP 26(f) Confere	ence:	11/12/2021 (instead of 10/15/2021)	
8	(b)	Initial Disclosures:		11/19/2021 (instead of 10/22/2021)	
9	(c)	Combined Joint Status Report:		11/24/2021 (instead of 10/29/2021)	
10	5.	The parties respectfully request that the Court enter the below Order extending the			
11	deadline as stipulated.				
12	DATED this 29th day of September, 2021.				
13	REID, MCCARTHY, BALLEW & FOX ROTHSCHILD LLP				
14	LEAHY, L.L.P.				
15	By /s/ Russell J. Reid Russell J. Reid, WSBA #2560 100 West Harrison Street North Tower, Suite 300 Seattle, WA 98119 Telephone: (206) 285-0464 Facsimile: (206) 285-8925		By /s/ James Breitenbucher James Breitenbucher, WSBA #27670		
16			1001 Fourth Avenue, Suite 4500 Seattle, WA 98154 Telephone: 206.624.3600 Facsimile: 206.389.1708		
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18				ail: jbreitenbucher@foxrothschild.com	
19	Email: rjr@rmbllaw.com Attorneys for Defendant			orneys for Defendant	
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THIRD STIPULATED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT (2:21-CV-00982-MJP) - 2

FOX ROTHSCHILD LLP 1001 FOURTH AVENUE, SUITE 4500

SEATTLE, WASHINGTON 98154 206-624-3600

1 **ORDER** 2 Based on the foregoing stipulation of the parties, IT IS HEREBY ORDERED that the time 3 for Defendant to answer or otherwise respond to Plaintiff's Complaint is extended to November 1, 4 2021. In addition, the Court's Order Regarding Initial Disclosures, Joint Status Report and Early 5 Settlement remains in effect, except the following deadlines: 6 Deadline for FRCP 26(f) Conference: 11/12/2021 7 Initial Disclosures Pursuant to FRCP 26(a)(1) 11/19/2021 8 Combined Status Report and Discovery Plan as Required by FRCP 26(f) 9 and Local Civil Rule 26(f): 11/24/2021 10 DATED this 30th day of September, 2021. 11 12 Marshy Helens 13 14 The Honorable Marsha J. Pechman United States Senior District Judge 15 16 17 18 19 20 21 22 23 24 25 26